

Claims 1, 2 and 8 stand finally rejected under 35 USC §102 as being anticipated or as being obvious over Chen. Claims 4-7, 9-10 and 11 stand finally rejected under 35 USC §103 as being unpatentable over Chen. Claim 3 stands rejected under 35 USC §103 as being unpatentable over Chen in view of Debevec. Based on the following, these rejections are respectfully traversed.

Previously, the Applicant has argued that the presently recited "computing a respective model for each input image, the respective model comprising information about surface patches located in the space of the scene, substantially each surface patch corresponding to a respective set of pixels in the respective input image" is not taught by Chen. However, the Examiner did not find this persuasive since the above rejection has been maintained.

In maintaining the above rejection, the Examiner states that Chen does disclose creating a model of the scene in terms of pixels with range data. In response, the Applicant respectfully submits that even if the Examiner's interpretation of Chen is correct, it still does not read on the above mentioned feature.

Claims 1 and 8 require "obtaining input images of a scene, each from a respective viewpoint" and then "computing a respective model for each input image". Therefore, the claims require computing a respective model for each of the different input images of scene.

However, in page 2, left column, lines 2-7, Chen discloses:

"The new method is based on the observance that a sequence of images from closely spaced viewpoints is highly coherent. Most of the adjacent images in the sequence depict the same objects from slightly different viewpoints. Our method uses the camera's position and orientation and the range data of the images to

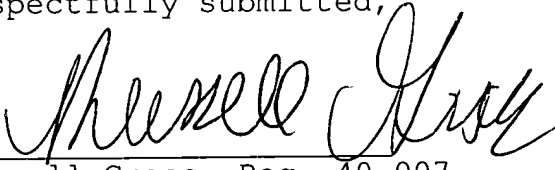
determine a pixel-by-pixel correspondence between images automatically."

Based on the above disclosure, it is evident that Chen does not disclose "computing a respective model for each input image", as required by the claims. Therefore, it is respectfully submitted that this feature is distinguishable over Chen.

The above-described deficiencies of Chen are also not addressed by Debevec since it is being relied on for other features. Thus, it is respectfully submitted that the invention of claims 1-11 is neither anticipated nor made obvious over Chen alone or in combination with Debevec. Therefore, it is respectfully requested that the above rejections be reconsidered and withdrawn so that the present application may proceed to issue.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Account No. 14-1270.

Respectfully submitted,

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